

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

JACOVETTI LAW, P.C., ET AT.,

Plaintiffs,

v.

JAMES EVERETT SHELTON, ET AL.,

Defendants.

Case No. 2:20-cv-00163-JDW

Hon. Joshua D. Wolson

**DECLARATION OF COUNSEL BRYAN
ANTHONY REO ESQ.**

1. My name is Bryan Anthony Reo. I am an attorney duly admitted to practice in both the State of Ohio and the State of Michigan. I am over 18 years of age. I am competent to testify and would do so if called upon. I make this declaration on personal knowledge and in my capacity as lead trial counsel for Plaintiff James Everett Shelton, under penalty of perjury.
2. I was admitted *Pro Hac Vice* to practice in this action.
3. On June 1, 2020 at 11:20 PM, I e-mailed Defendants' counsel, Joshua Louis Thomas, Esquire at joshualthomas@gmail.com. A true and genuine copy of the e-mail sent to Mr. Thomas is attached as Exhibit "2".
4. The e-mail read "Sir, Please find attached the Rule 11 Motion we will be finding [sic] and a cover letter explaining the situation. Sincerely, Bryan Reo".
5. Attached to the e-mail was a document titled "Rule 11 Letter to Josh Thomas.pdf", as well as a text-searchable and editable Microsoft Word copy of the Rule 11 Letter. A true and genuine copy of the Rule 11 Letter sent to attorney Thomas on June 1, 2020 is attached as Exhibit "Exhibit 3".

6. Attached to the e-mail also was a document titled "Jacovetti v. Shelton Service of Notice of Rule 11 Def Motion for Sanctions.pdf", as well as a text-searchable and editable Microsoft Word copy of the same. A true and genuine copy of the above-titled document is attached hereto as Exhibit 4. This document was subsequently filed with the Court on June 23, 2020 as Defendants' Motion for Sanctions (ECF No. 51).

7. Defendants' counsel received this e-mail.

8. This e-mail was not returned to me as undeliverable.

9. In fact, Attorney Thomas filed a true and correct copy of the e-mail as an exhibit in his brief in opposition to the Motion for Sanctions (ECF No. 53, filed July 14, 2020).

10. In addition to e-mail, I served Defendants' counsel with hard copies of the Rule 11 Letter and draft Rule 11 Motion for Sanctions, via USPS First Class Mail, postage prepaid, at the following address:

JOSHUA L. THOMAS & ASSOCIATES PLLC
225 WILMINGTON-WEST CHESTER PIKE
SUITE 200
CHADDS FORD, PA 19317

11. At no time was Defendants' counsel's mailing to Joshua Thomas returned as undeliverable.

Sworn under the pains and penalty of perjury this 15th day of July, 2020.

Respectfully submitted,

REO LAW, LLC

/s/ Bryan A. Reo

Bryan A. Reo, Esq.

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Attorney for James Everett Shelton and Final Verdict Solutions